

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

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|--|---|---|-----------------------------------|
| CHAZ CAMPTON, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED, |) |) | No. 4:12-cv-02196 |
| |) |) | |
| |) |) | |
| |) |) | CLASS ACTION |
| |) |) | |
| v. |) |) | |
| |) |) | District Judge Vanessa D. Gilmore |
| IGNITE RESTAURANT GROUP, INC., |) |) | |
| RAYMOND A. BLANCHETTE, III, JEFFEREY |) |) | |
| L. RAGER, EDWARD W. ENGEL, CREDIT |) |) | |
| SUISSE SECURITIES USA LLC, ROBERT W. |) |) | |
| BAIRD & CO. INC., PIPER JAFFRAY & CO., |) |) | |
| KEYBANC CAPITAL MARKETS, INC., |) |) | |
| LAZARD CAPITAL MARKETS LLC, |) |) | |
| RAYMOND JAMES & ASSOCIATES, INC., |) |) | |
| |) |) | |
| |) |) | |
| Defendants. |) |) | |

AGREED STIPULATION AND [PROPOSED] ORDER

WHEREAS, this matter alleges claims pursuant to Sections 11, 12(a)(2) and 15 of the Securities Exchange Act of 1933 and is therefore governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. §77z-1(a), et seq.

WHEREAS, the deadline for putative class members to seek appointment as lead plaintiff was September 18, 2012. Class members Chaz Campton and Cynthea Rumenapp timely made a motion for appointment as Lead Plaintiffs and for approval of their selection of The Rosen Law Firm, P.A. as Lead Counsel and the Payne Mitchell Law Group, LLP as Liaison Counsel (Dkt. #24);

WHEREAS, Campton and Rumenapp’s motion is unopposed, and if appointed as Lead Plaintiffs Campton and Rumenapp intend on filing an amended complaint as Lead Plaintiffs on behalf of the putative class;

WHEREAS, an initial conference is scheduled with the Court for November 16, 2012 at 1:30 p.m. to set a discovery schedule (Dkt. # 2);

WHEREAS, pursuant to the PSLRA discovery is automatically stayed prior to the Court sustaining the operative complaint filed by lead plaintiff, *See* 15 U.S.C. §77z-1(b);

THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and the undersigned parties to this action, as follows:

1. Defendants are not required to answer, move or otherwise respond to the current complaint in this action, and Defendants waive none of their rights or defenses by not answering, moving or otherwise responding to the current complaint.

2. 45 days following the appointment of Lead Plaintiffs and Lead Counsel, Lead Plaintiffs shall file an amended complaint;

3. Defendants shall answer or otherwise respond to the amended complaint within 45 days of filings;

4. If a motion to dismiss is filed, Lead Plaintiffs shall have 30 days to oppose, and Defendants shall have 21 days to reply; and

5. The Parties shall jointly approach the Court to seek a continuance of the November 16, 2012 Initial Conference until after the Court has sustained the sufficiency of the Amended Complaint.

SO ORDERED this _____ day of October, 2012.

United States District Court Judge

Respectfully submitted,

Dated: October 24, 2012

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RAYMOND JAMES & ASSOCIATES, INC.**